

HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HP TUNERS, LLC, a Nevada limited liability company,)	CASE NO. 3:17-cv-05760-BHS
)	
Plaintiff,)	DECLARATION OF STEPHEN G.
)	LEATHAM, ESQ. IN SUPPORT OF
vs.)	PLAINTIFF’S PETITION FOR FEES
)	
KEVIN SYKES-BONNETT and SYKED ECU TUNING INCORPORATED, a Washington corporation, and JOHN MARTINSON,)	
)	
)	
Defendants.)	

I, Stephen G. Leatham, Esq., hereby declare as follows:

1. I am of legal age, have personal knowledge of the facts provided herein and, if called as a witness, could and would testify competently to those facts.
2. I am a licensed attorney in the State of Washington and am a member in good standing of the Washington bar.
3. I have been a licensed attorney in the State of Washington since 1985.
4. I am a partner with the firm of Heurlin, Potter, Jahn, Leatham, Holtmann & Stoker, P.S.
5. I am an attorney representing Plaintiff HP Tuners, LLC in connection with this

1 matter.

2 6. This Declaration is submitted in support of Plaintiff's Petition for Fees as allowed
3 by this Court in its Order Granting Plaintiff's Motion for Sanctions and Scheduling Fee Petition
4 (Docket No. 155).

5 7. Based on my experience practicing law in this District, I believe that an hourly
6 rate of \$350.00 per hour for attorney time in connection with this matter is reasonable and
7 customary for complex commercial litigation services of this type in this District.

8 I declare under penalty of perjury under the laws of the United States of America the
9 foregoing is true and correct to the best of my knowledge.

10 Executed on March 29, 2019 at Vancouver, Washington.

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12 By: s/Stephen G. Leatham
13 Stephen G. Leatham
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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019, I caused the foregoing to be electronically with the Clerk of Court using the CM/ECF system which will electronically send Notice to all Counsel of Record.

s/ Stephen G. Leatham

Stephen G. Leatham, WSBA #15572
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